

**Comments from the Council on Environmental Quality on the
Interagency Science Consultation Draft Trimethylbenzene Assessment**

The IRIS Program is to be commended on the new format for the toxicological reviews. The document is more accessible, easier to read, and there is greater transparency in the presentation of key assumptions. The effective use of figures and tables are also notable.

Overall the assessment for 1,2,4- and 1,3,5-trimethylbenzene seems sound and defensible. The charge questions largely addressed the key issues and with some minor changes the materials are suitable for external review.

One higher level question – why did EPA determine that the third isomer, 1,2,3-trimethylbenzene, should not be included? Please provide an explanation in the assessment. Since the toxicity data from one isomer (1,2,4-TMB) is used to derive the toxicity values for another (1,3,5-TMB) it is not clear what this couldn't also be done for the third one.

In the preamble, we suggest adding some additional information (i.e., internet addresses) to the second paragraph in order to facilitate the reader's ability to locate assessments for the chemicals that are not covered by the IRIS program. We also suggest that you replace "White House offices" with Executive Office of the President offices.

In the preface, we recommend some modification to the program interest section. Consider starting with the second sentence (why the assessment is being developed). We also recommend inserting "some" before Superfund sites. Here, and elsewhere (e.g., second paragraph of preamble) it would be helpful to explain why 1,2,3-TMB is not included (as noted above). Finally, are there any other programs that might have an interest in this assessment?

The executive summary starts with a section on effects other than cancer. The title of this section, and in particular the "other than cancer" portion, seems awkward since it precedes the cancer section. We suggest that you move the cancer section forward rather than trying to rename the section. For this assessment cancer is not critical, but in many assessments it will be one of the most important sections and it may be helpful to revise the historic IRIS format of presenting that information at the end.

Finally, we recommend that the IRIS program consider modifying the new IRIS assessment format to include a section focused on the critical (or co-critical) study. For example, we think that some of the information about the critical study that presented in Appendix A could be moved into the main document and expanded upon.

Thanks again for the opportunity to review and comment on this assessment.

Regards,

Stiven Foster

Deputy Associate Director for Chemical Regulations

Council on Environmental Quality